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BEFORE THE  
**Federal Communications Commission**

WASHINGTON, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

WT Docket No. 96-86

*In the Matter of* )  
 )  
The Development of Operational, )  
Technical, and Spectrum )  
Requirements for Meeting Federal )  
State and Local Public Safety Agency )  
Communication Requirements )  
Through the Year 2010 )

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To: The Commission

**Reply Comments of Securicor Radiocom Limited**

Securicor Radiocom Limited ("Securicor"),<sup>1</sup> by its counsel, hereby files these Reply Comments in the above-captioned proceeding.<sup>2</sup> Securicor is a leading developer of the highly-spectral efficient Linear Modulation technology, with existing 5 kHz LM systems representing state-of-the-art technology. In its initial Comments, Securicor urged the Commission to adopt rules and policies that will allow all spectrally efficient technologies, including 5 kHz LM systems, to compete in the marketplace on a "level playing field."

<sup>1</sup> On December 3, 1996, Securicor closed its previously announced transaction with INTEK Diversified Corp. ("INTEK"). As a result, Securicor Radiocom now operates as a subsidiary of INTEK.

<sup>2</sup> *The Development of Operational, Technical, and Spectrum Requirements for Meeting Federal, State and Local Public Safety Agency Communication Requirements Through the Year 2010*, WT Docket No. 96-86, FCC 96-155, released April 10, 1996. ("Notice"); Final Report Of The Public Safety Wireless Advisory Committee, September 11, 1996. ("PSWAC Report" or "Report").

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The record in this proceeding establishes that pursuant to its mandate under the Communications Act to promote the most effective and efficient use of the spectrum, the Commission should establish a truly level playing field that accommodates 5 kHz LM systems. A "neutral technology" policy is favored by many commenters, including large and small public safety users and equipment manufacturers. In addition, any plan to promote spectrally-efficient technologies, including 5 kHz LM systems, must provide coordinators with sufficient flexibility to make recommendations to the Commission resolving potential licensing conflicts between different technologies.

**I. Any Spectrum Plan Must Accommodate All Spectrally Efficient Technology, including 5 kHz LM Systems.**

Many commenters support the Commission's goal of creating a level playing field in order to foster competition among manufacturers of spectrally-efficient technologies. For example, The International Municipal Signal Association and the International Association of Fire Chiefs, Inc. (IMSA/IAFC) "urge the Commission to be technology-neutral in adopting rules in this proceeding." IMSA/IAFC specifically cautions against the adoption of rules to favor any one manufacturer.<sup>3</sup>

Other manufacturers also agree with this position. Nippon Telegraph and Telephone ("NTT"), a developer of narrowband equipment, concurs that "the efficiency standards adopted by the Commission must be technology-neutral, so as to assure that a competitive marketplace will continue to advance the state of the art."<sup>4</sup> NTT contends that "a competitive marketplace will best provide users with the widest variety of available service features at the lowest costs."<sup>5</sup> NTT further urges the Commission to adopt a variety of marketplace incentives, such as channel exclusivity and the ability to lease

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<sup>3</sup> IMSA/IAFC Comments, at 24.

<sup>4</sup> NTT Comments, at 4.

<sup>5</sup> NTT Comments, at 7.

excess capacity, in order to assist public safety users in migrating to more efficient technologies.<sup>6</sup>

Securicor agrees with NTT and with those public safety users such as the California Public-Safety Radio Association who believe that deployment of spectral-efficient technologies should be "market-driven."<sup>7</sup> However, as Securicor stressed in its Comments, the Commission must establish a truly level playing field in order to achieve maximum spectrum utilization through the entry of spectrally-efficient technologies such as 5 kHz LM systems. In such an environment, Securicor is confident that its 5 kHz LM systems will flourish with resulting benefits to the public safety community and to the Commission's goal of more efficient spectrum utilization.

For example, the American Association of State Highway and Transportation Officials (AASHTO) indicates that new technologies are needed for improved voice quality with reduced bandwidth.<sup>8</sup> As noted in Securicor's Comments, 5 kHz LM technology offers speech quality equal to that of a toll telephone circuit. Likewise, Prince William County notes that new technologies are necessary to "enable agencies to implement the transmission of fingerprints, graphics, photographs and video to and from the field."<sup>9</sup> Again, as was *demonstrated* to the Commission, at the March 5, 1996 *en banc* hearing on spectrum, Securicor's system is capable of satisfying a wide range of needs including data with graphic formats, color pictures and even slow-scan video, over a 5 kHz LM channel.<sup>10</sup> Finally, contrary to the concern expressed by APCO regarding the cost of LM systems, in a truly "technology neutral" environment Securicor's 5 kHz LM system will meet the specific needs of a wide range of public safety users *in an affordable , cost effective manner*.<sup>11</sup>

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<sup>6</sup> NTT Comments, at 7.

<sup>7</sup> Comments of California Public-Safety Radio Association, at 3.

<sup>8</sup> Comments of American Association of State Highway and Transportation Officials, at 11.

<sup>9</sup> Comments of Prince William County, Virginia, at 2-3.

<sup>10</sup> Securicor Comments, at 2.

<sup>11</sup> APCO Comments, at 15.

## **II. The Public Safety Frequency Coordinators Must Be Given Sufficient Flexibility To Accommodate All Spectrally Efficient Technologies.**

In its initial Comments, Securicor noted that in order to allow all spectrally-efficient technologies to compete on a "level playing field" it is important that the Commission provide the public safety coordinators with sufficient flexibility in making licensing assignments. Securicor stressed that this should include the authority to move the center frequency on specific assignments in order to accommodate greater channel usage while reducing interference issues. Securicor also proposed that the coordinators should be given broad authority to require public safety users to work out potential interference issues through agreements and where necessary, waiver requests to the Commission.

The commenters acknowledge the important role that frequency coordinators must play in assuring the efficient utilization of the spectrum. As emphasized by Prince William County, Virginia, the expertise of the coordinators is "an asset to public safety services." The County states that the coordinators are not only "in the best interest of the public" but are, in fact, "critical to the public safety radio services."<sup>12</sup> APCO, which currently coordinates about 80% of the public safety users, notes that it already expends great effort in attempting to make recommendations that will maximize the use and reuse of public safety spectrum.<sup>13</sup> APCO further recognizes that this process will become increasingly more important as channel spacings are reduced.<sup>14</sup>

APCO, however, opposes the Commission's proposal to provide frequency coordination *after* a FCC license grant, in part, because it would lead to greater liability issues.<sup>15</sup> While Securicor supports an expanded role for

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<sup>12</sup> Comments of Prince William County, Virginia, at 5.

<sup>13</sup> APCO Comments, at 16.

<sup>14</sup> APCO Comments, at 16.

<sup>15</sup> APCO Comments, at 27; APCO is also concerned about cost considerations in having to establish its own data base. However, this concern can be greatly alleviated if the Commission makes available a common data base for all coordinators.

the coordinators it agrees with APCO that the Commission must maintain the ultimate responsibility for licensing . In this way, the coordinator will be free to make specific recommendations for resolution of conflicts, free of any concerns about liability. Securicor, however, stresses that a truly level playing field can be established only if the coordinators are given sufficient flexibility to accommodate all spectrally-efficient technology.

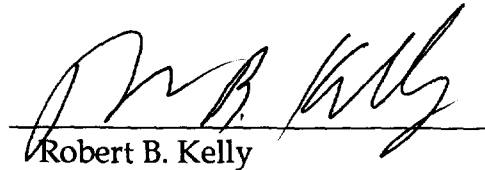
### III. CONCLUSION

In view of the foregoing, the Commission should adopt rules and policies consistent with the views expressed herein.

Respectfully submitted,

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Dated: December 19, 1996

Certificate of Service

I, Robert B. Kelly, an attorney in the law firm of KELLY & POVICH, P.C., hereby certify that on this 19th day of December, 1996, I caused a true and complete photocopy of the foregoing "Reply Comments" to be sent, via U.S. first class mail, postage prepaid, to the following:

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